

Plaintiff has already furnished BASF with copies of -

- ✓ Birth Certificate
- ✓ Social Security Card
- ✓ South Carolina Driver License
- ✓ Document signed by company official hiring plaintiff
- ✓ Resignation on 4/20/1980
- ✓ Statement of earnings
- ✓ Pay stub from 12/16/1973
- ✓ Copies of W2 from 1968 thru 1980, showing no settlement
- ✓ List of former supervisors
- ✓ Copy of 10 year Service Award
- ✓ Employee Number 293360

Calculations

Year	Salary	3.5% Pension Contribution	Rate	Duration (years)	Value as of DEC 2018
*1968	1392.11	48.72		50	590.46
1969	5780.58	202.32		49	2332.65
1970	7236.45	253.28		48	2778.06
1971	8112.21	283.93		47	2962.67
1972	8342.18	291.98		46	2898.38
1973	8348.80	292.21		45	2759.48
1974	10316.44	361.08	5% /Yr	44	3243.89
1975	12030.83	421.08		43	3598.80
1976	12903.20	451.61		42	3671.87
1977	13537.89	473.83		41	3665.02
1978	14736.45	515.78		40	3795.32
1979	15850.77	554.78		39	3883.61
1980	7609.22	266.32		38	1773.57
Totals	126197.13	4416.90			

Value of Pension in Dec 2018 37953.78

Value of Out-of-Pocket \$ 2500/yr x 3 Yr 7500.00

TOTAL VALUE of Pension @ Dec 2018 45453.78

Punitive Damages (x 2.75) for Deliberate Delay of Pension Payments for over 3 years 125,000.00

Suggested Final 'Lump Sum' Settlement 170453.78

Alternative Settlement Option

Single Payment of	25,000.00
Monthly Payments for Life	700.00
Annual Out-of-Pocket Medical Expenses with Receipts	2000.00

* Plaintiff worked 4 months and then went on military active duty for four months with the USAR @ Fort Polk, LA